



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

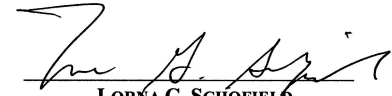
November 15, 2021

BY CM/ECF

The Hon. Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Application Granted. The deadline for the Government to complete the production of Rule 16 discovery is extended to **November 22, 2021**. The Clerk of the Court is directed to terminate the letter motion at docket number 24.

Dated: November 12, 2021
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *United States v. Enald Beqiraj, a/k/a "Aldo Beqiraj," 21 Cr. 656 (LGS)*

Dear Judge Schofield:

The Government writes to respectfully request an extension of time to produce Rule 16 discovery in the above-referenced matter from November 15, 2021 – the current deadline for producing Rule 16 discovery – until November 22, 2021.

On or about March 24, 2021, the Government obtained a Complaint charging the defendant with two counts of wire fraud, in violation of 18 U.S.C. §§ 1343 and 2. On or about March 29, 2021, the defendant was arrested at his residence in Salem, Massachusetts. He was presented the next day and released on pretrial bail conditions. On April 20, 2021, the defendant as presented in this District and permitted to remain on release subject to the same conditions. After the parties agreed to continue the preliminary hearing deadline and indictment deadline several times, on October 27, 2021, the defendant agreed to the filing of an Information and pleaded not guilty. On November 15, 2021, the Court granted the parties request for a deadline of November 15, 2021, to produce Rule 16 discovery, set a status conference for February 8, 2022, and set a deadline for pretrial motions of February 14, 2022. *See* Dkt. No. 23. The Court excluded time under the Speedy Trial Act until February 8, 2022. *Id.*

Beginning soon after the defendant's arrest, the parties engaged in detailed discussions about a pretrial resolution. Pursuant to these discussions, the Government has produced certain preindictment discovery. The Government is preparing a significant initial production of post-indictment discovery, and expects to produce it within the next two days. The Government respectfully requests an adjournment of time until November 22, 2021, to complete the production of Rule 16 discovery, including several voluminous electronic device records. The remaining

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deadlines in this case for pretrial motions and a status conference can remain unchanged. The defendant consents to this request.

Respectfully submitted,

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Cc: Counsel for the defendant (via CM/ECF)